

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

BRIAN HUGHS,

Plaintiff,

v.

ROYAL ENERGY RESOURCES, INC. and  
WILLIAM TUORTO,

Defendants.

C/A No.: 2:20-cv-1566-RMG

**PLAINTIFF'S ANSWERS TO LOCAL  
RULE 26.01 INTERROGATORIES**

Plaintiff, Brian Hughs, hereby responds to the following Interrogatories, as stated in DSC Local Rule 26.01:

- A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE:** N/A

- B. As to each claim, state whether it should be tried by jury or nonjury and why.

**RESPONSE:** Plaintiff brings four claims. If this case proceeds to trial, all claims should be tried by a jury. Plaintiff is entitled to a jury trial on Counts One (Dodd-Frank Whistleblower Retaliation), Three (Breach of Contract), and Four (Breach of Contract Accompanied by a Fraudulent Act) pursuant to the Seventh Amendment to the Constitution of the United States and the South Carolina Constitution, Article I, Section 14. Plaintiff is entitled to a jury trial under Count Two (Sarbanes-Oxley Whistleblower Retaliation) pursuant to 18 U.S.C. § 1514A(b)(2)(E).

- C. State whether the party submitting these responses is a publicly owned company and

separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**RESPONSE:** Brian Hughs is a natural person.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

**RESPONSE:** A substantial part of the events or omissions occurred in or around Charleston, South Carolina. The headquarters and principal executive offices of Defendant Royal Energy Resources, Inc. are located in Charleston, South Carolina. On information and belief, Defendant William Tuorto is a resident of Charleston County, South Carolina.

E. Is this action related in whole or in part to any other matter filed in this District whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases; arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE:** No.

s/Christy Ford Allen  
Christy Ford Allen (Fed. Bar #07549)  
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ATTORNEYS FOR PLAINTIFF

CHARLESTON, SC

April 22, 2020